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**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

IN THE MATTER OF THE TAX  
LIABILITIES OF:

JOHN DOES, United States taxpayers who,  
at any time during the years ended December  
31, 2013, through December 31, 2020, used  
the services of Panama Offshore Legal  
Services, including its predecessors,  
subsidiaries, and associates, to establish,  
maintain, operate, or control any foreign  
financial account or other asset; any foreign  
corporation, company, trust, foundation or  
other legal entity; or any foreign or domestic  
financial account or other asset in the name of  
such foreign entity.

Case No. 21 Misc. 424

**NOTICE OF FILING OF EX  
PARTE PETITION FOR LEAVE  
TO SERVE “JOHN DOE”  
SUMMONSES**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and supporting Declaration of Katy Fuentes, the United States of America, by its attorney, Audrey Strauss, United States Attorney for the Southern District of New York, has filed this *ex parte* petition pursuant to Section 7609(f) of the Internal Revenue Code, 26 U.S.C. § 7609(f), for leave to serve Internal Revenue Service “John Doe” summonses (collectively, the “Summonses”) upon Federal Express Corporation a/k/a FedEx Express; Fed Ex Ground Package System, Inc. a/k/a FedEx Ground; DHL Express (USA), Inc.; United Parcel Service, Inc.; the Federal Reserve Bank of New York; The Clearing House Payments Company LLC; HSBC Bank USA, N.A.; Citibank, N.A.; Wells Fargo Bank, N.A.; and Bank of America, N.A. The Court’s determination on the

United States’ petition “shall be made ex parte and shall be made solely on the petition and supporting affidavits.” 26 U.S.C. § 7609(h)(2). Because the pleadings filed in this proceeding will not be served upon any person or entity and no other filings are permitted from other persons or entities, this petition is ripe for the Court’s consideration. The United States respectfully requests that the Court review its petition and supporting documents and enter the proposed Order at the Court’s earliest opportunity.

Dated: New York, New York  
May 4, 2021

Respectfully submitted,

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Southern District of New York

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